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11 UNITED STATES BANKRUPTCY COURT
12 EASTERN DISTRICT OF WASHINGTON

13 In re:

14 GIGA WATT INC,

15 Debtor.
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} Case No. 18-03197-FPC11

} MOTION AND NOTICE TO LIMIT
} NOTICE OF CREDITOR CHELAN
} DOUGLAS REGIONAL PORT
} AUTHORITY, FORMERLY THE PORT OF
} DOUGLAS COUNTY'S MOTION FOR
} RELIEF FROM AUTOMATIC STAY;
} ABANDONMENT OF PROPERTY OF
} THE ESTATE AND WAIVER OF FRBP
} 4001(a)(3)

20 Comes now creditor Chelan Douglas Regional Port Authority, formerly the Port
21 of Douglas County (the "Port"), former landlord of Debtor herein, by and through its
22 attorney, William L. Hames of Hames, Anderson, Whitlow, & O'Leary P.S., and hereby
23 requests the court's authorization to limit notice of its County's Motion for Relief from
24 Stay and Abandonment of Property the Estate filed simultaneously herewith. The Port
25 seeks to limit notice to the following:

MOTION AND NOTICE TO LIMIT NOTICE OF
CREDITOR CHELAN DOUGLAS REGIONAL
PORT AUTHORITY, FORMERLY THE PORT OF
DOUGLAS COUNTY'S MOTION FOR RELIEF
FROM AUTOMATIC STAY; ABANDONMENT OF
PROPERTY OF THE ESTATE AND WAIVER OF
FRBP 4001(a)(3) - 1

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- 1 a) Chapter 11 Trustee
2 b) the US Trustee's office,
3 c) the unsecured creditor's committee,
4 d) All parties receiving ECF notice and
5 e) the 20 largest creditors as designated on the Debtor's schedules

6 The Chapter 11 Trustee and the unsecured Creditors' Committee are both
7 represented by counsel. The Port submits that limiting notice will not prejudice any
8 creditor. Further, the costs of serving all creditors in this case would be prohibitive.

9 LBR 2002-1 permits less inclusive notice to be given "if not prohibited by the
10 Code or Rules, and specifically allowed by the Court..." LBR 2002-1(b)(1)(B). The Port
11 is not aware of any specific prohibitions against the court entering an order permitting
12 limitation of notice as requested herein and submits that good cause exists for so
13 doing.

14 **NOTICE**

15 **IF YOU OBJECT TO THE RELIEF REQUESTED ABOVE, YOU MUST FILE A**
16 **WRITTEN OBJECTION WITH THE CLERK OF THE ABOVE-ENTITLED COURT**
17 **AND REQUEST A HEARING AT P.O. BOX 2164, W. 904 RIVERSIDE, ROOM 321,**
18 **SPOKANE, WASHINGTON 99210, ON OR BEFORE 24 DAYS (21 DAYS PLUS 3**
19 **DAYS FOR MAILING) FROM THE DATE OF THIS NOTICE AND SERVE A COPY**
20 **ON THE UNDERSIGNED AT 601 W. KENNEWICK AVENUE, PO. BOX 5498,**
21 **KENNEWICK, WASHINGTON 99336; MARK WALDRON, CHAPTER 11 TRUSTEE,**
22 **AT 6711 REGENTS BOULEVARD WEST, SUITE B, TACOMA, WA 98466; AND**
23 **UPON THE OFFICE OF THE UNITED STATES TRUSTEE, NORTH 221 WALL**
24 **STREET #538, SPOKANE, WA 99201.**

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MOTION AND NOTICE TO LIMIT NOTICE OF
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FROM AUTOMATIC STAY; ABANDONMENT OF
PROPERTY OF THE ESTATE AND WAIVER OF
FRBP 4001(a)(3) - 2

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1 **SHOULD YOU FAIL TO OBJECT AS SET FORTH ABOVE, PLEASE**
2 **FURTHER BE ADVISED THAT THE RELIEF REQUESTED MAY BE GRANTED**
3 **WITHOUT FURTHER NOTICE TO YOU.**

4 DATED this 29th day of January 2020.

5 HAMES, ANDERSON, WHITLOW & O'LEARY, P.S.
6 Attorneys for Creditor Chelan Douglas Regional Port
7 Authority, formerly the Port of Douglas County

8 By: /s/ William L. Hames
9 WILLIAM L. HAMES, WSBA #12193

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MOTION AND NOTICE TO LIMIT NOTICE OF
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PORT AUTHORITY, FORMERLY THE PORT OF
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FROM AUTOMATIC STAY; ABANDONMENT OF
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FRBP 4001(a)(3) - 3

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**** PROPOSED FORM OF ORDER ****

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re:

GIGA WATT INC,

Debtor.

} Case No. 18-03197-FPC11

} ORDER LIMITING NOTICE OF
} CREDITOR CHELAN DOUGLAS
} REGIONAL PORT AUTHORITY,
} FORMERLY THE PORT OF DOUGLAS
} COUNTY'S MOTION FOR RELIEF
} FROM AUTOMATIC STAY;
} ABANDONMENT OF PROPERTY OF
} THE ESTATE AND WAIVER OF FRBP
} 4001(a)(3)

This matter having come before the above-entitled court on creditor Port of Douglas County's Motion to Limit Notice of the Port of Douglas County's Motion for Relief from Stay and Abandonment of Property the Estate, and the court finding that good cause exists to grant the relief requested, NOW, THEREFORE,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED the Port's motion is granted.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that notice of the Port of Douglas County's Motion for Relief from Stay and Abandonment of Property the Estate may be limited to:

- a) Chapter 11 Trustee;
- b) Office of the US Trustee;

ORDER LIMITING NOTICE OF CREDITOR CHELAN DOUGLAS REGIONAL PORT AUTHORITY, FORMERLY THE PORT OF DOUGLAS COUNTY'S MOTION FOR RELIEF FROM AUTOMATIC STAY; ABANDONMENT OF PROPERTY OF THE ESTATE AND WAIVER OF FRBP 4001(a)(3) - 1

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- 1 c) The Unsecured Creditor's Committee;
2 d) All parties receiving ECF notice; and,
3 e) 20 largest creditors as listed on Debtor's schedules.

4 /// END OF ORDER ///

5 Presented by:

6 HAMES, ANDERSON, WHITLOW & O'LEARY, P.S.
7 Attorneys for Creditor Chelan Douglas Regional Port Authority,
8 formerly the Port of Douglas County

9 By: _____
10 WILLIAM L. HAMES, WSBA #12193
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ORDER LIMITING NOTICE OF CREDITOR CHELAN
DOUGLAS REGIONAL PORT AUTHORITY,
FORMERLY THE PORT OF DOUGLAS COUNTY'S
MOTION FOR RELIEF FROM AUTOMATIC STAY;
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